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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

|                     |   |                    |
|---------------------|---|--------------------|
| IN RE:              | § | CASE NO.: 24-31651 |
| JAMISON HAMLIN DYER | § |                    |
| DEBTOR              | § | CHAPTER 13         |

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DEBTOR'S APPLICATION TO EMPLOY  
SPECIAL LITIGATION COUNSEL PURSUANT TO U.S.C. §330

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TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Debtor, by and through the undersigned attorney, and files this *Debtor's Application to Employ Special Litigation Counsel Pursuant to 11 U.S.C. §330* and would respectfully show the Court as follows:


1. On April 12, 2024, Debtor filed a Chapter 13 Bankruptcy, and on April 17 2024, filed *Notice of Removal* of state court matter pending in the 127<sup>th</sup> Judicial District Court of Harris County, Texas under Cause No. 2023-08753, in which Debtor is the Plaintiff and multiple individuals and entities are Defendants.
2. It is necessary to employ special litigation counsel to represent Debtor in the above-referenced litigation matter involving
  - a. a petition to recover a homestead;

- b. breaches of fiduciary duties;
- c. statutory fraud;
- d. common law unreasonable collection efforts;
- e. violation of the Texas Fair Debt Collection Act;
- f. Conversion of both real and personal property;
- g. Trespass to Try Title and Quiet Title Action claims under state law; and which proceeding will be amended to include
- h. avoidance of sale under 11 U.S.C. §§ 547 and 548 as it relates to homestead claims under § 522(h) of the Bankruptcy Code.

3. Debtor seeks to employ Susan C. Norman, an attorney licensed to practice in the State of Texas and in the United States District Court for the Southern District of Texas for this adversary proceeding. Moreover, Ms. Norman is experienced in state court litigation involving wrongful foreclosure matters and the litigation issues set out above, and is currently a counsel of record for Debtor in its pending state court litigation involving the wrongful foreclosure as well as the various state court matters set out above.

WHEREFORE, for these reasons, Debtor respectfully requests that the Court grant this Debtor's Application to Employ Special Litigation Counsel pursuant to 11 U.S.C. §330.

Respectfully submitted,



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Counsel for Debtor

Certificate of Service

I hereby certify that on April 23, 2024, I sent a true and correct copy of the *Debtor's Application to Employ Special Litigation Counsel Pursuant to 11 U.S.C. §330* to the below-listed individuals who have electronic service, through the Court's Pacer system, and, by First Class United States Mail, postage prepaid to those who do not use electronic service.



Susan C. Norman

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